

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ Delta, LLC,  
*Plaintiff,*

v.

CommScope Holding Company, Inc., *et al.*,  
*Defendants.*

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED

**DECLARATION OF RAJENDRA A. CHIPLUNKAR**

I, Rajendra A. Chiplunkar, state as follows in support of Plaintiff TQ Delta, LLC's Motion to Strike Portions of the Non-Infringement Report and Opinions of Defendants' Expert Dr. Naofal Al-Dhahir:

1. I am a partner at McAndrews, Held & Malloy and counsel of record for TQ Delta, LLC. I am a member in good standing of the State Bar of Illinois. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit A contains an excerpt from a true and correct copy of the Responsive Expert Report of Dr. Naofal Al-Dhahir Regarding Family 10.
3. Exhibit B contains true and correct copy of the Cover Pleading for Plaintiff's Disclosure of Asserted Claims and Infringement Contentions and Accompanying Document Production.
4. Exhibit C contains true and correct copy of Plaintiff TQ Delta's First Set of Interrogatories to the Commscope Defendants (Nos. 1-18).
5. Exhibit D contains an excerpt from a true and correct copy of Commscope's Sixth Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories (Nos. 1-18).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14<sup>th</sup> day of December 2022, in River Forest, Illinois.

/s/ Rajendra A. Chiplunkar  
Rajendra A. Chiplunkar